SUBMITTAL OF FINAL INTERIM RECORD OF DECISION FOR OU 3

07/25/94

USEPA DOE-FN 3 COMMENTS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY.

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

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REPLY TO THE ATTENTION OF:

TJUL 2 5 1994

Mr. Jack R. Craig
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati. Ohio 45239-8705

HRE-8J

RE: Submittal of Final Interim
Record of Decision for OU 3

Dear Mr. Craig:

This letter serves notification that the Regional Administrator of the United States Environmental Protection Agency (U.S. EPA), Region V has signed the Interim Record of Decision (IROD) for Operable Unit 3 at the United States Department of Energy's Feed Materials Production Center.

Please submit three (3) copies of the IROD with the signed cover page to U.S. EPA within fourteen (14) days of receipt of this letter.

Please contact me at (312) 886-0992 if you have any questions.

Sincerely,

Vames A. Saric

Remedial Project Manager

Technical Enforcement Section #1

RCRA Enforcement Branch

cc: Tom Schneider, OEPA-SWDO
Pat Whitfield, U.S. DOE-HDQ
Don Ofte, FERMCO

Jim Thiesing, FERMCO Paul Clay, FERMCO (JANKE(RJ)
PARTIAL
ACTION RESPONSE
TO R-1658
(8016)

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504.4 4-005-504. The major components of the selected interim remedy include:

- Decontamination of more than 200 buildings and structures in Operable Unit 3 by removing loose contamination;
- Dismantlement of the above-ground structures;
- Removal of foundations, storage pads, ponds, basins, underground utilities, and other at and below-grade structures;
- Use of existing facilities or construction and operation of new interim storage facilities in or near the former production area;
- Off-site disposal at Nevada Test Site of some non-recoverable or non-recyclable waste and debris generated by dismantlement;
- Off-site recycling of some recyclable material from dismantlement;
- Storage of the remaining waste and debris in interim storage facilities or existing facilities until treatment and disposition are selected in the final remedial action Record of Decision for Operable Unit 3.

STATUTORY DETERMINATIONS:

The selected interim remedial action is protective of human health and the environment, complies with Federal and State applicable or relevant and appropriate requirements directly associated with the action, and is cost effective. The selected interim remedy best meets the evaluation criteria by addressing risks to human health and the environment, accelerating the remediation process by nearly four years, and reducing overall costs associated with Operable Unit 3 remediation.

This action does not constitute the final remedy for Operable Unit 3, the statutory preference for permanent solutions and remedies that employ treatment to reduce toxicity, mobility, or volume as a principal element will be addressed by the final remedial action for Operable Unit 3. However, this action does utilize permanent solutions and alternative treatment (or resource recovery through recycling and reuse) technologies to the maximum extent practicable, given the limited scope of the action. A subsequent final remedial action is planned to address the remaining scope of Operable Unit 3. Although this remedy will result temporarily in radiological and/or hazardous substances remaining on site above material free release limits, the final remedial action will address the disposition of these remediation wastes and determine the need for future review to ensure that the final remedial action provides adequate protection of human health and the environment. Because this is an interim remedial action ROD, review of this site and of this remedy will continue as DOE and EPA develop final remedial alternatives for Operable Unit 3.

Acting Deputy Assistant Secretary for Environmental Management

U.S. Department of Energy

Date

Regional Administrator

U.S. Environmental Protection Agency, Region V

Date

RECORD OF DECISION DECLARATION INTERIM REMEDIAL ACTION FOR OPERABLE UNIT 3

SITE NAME AND LOCATION:

U.S. Department of Energy
Fernald Environmental Management Project -- Operable Unit 3
Fernald, Ohio

STATEMENT OF BASIS AND PURPOSE:

This decision document presents the selected interim remedial action for Operable Unit 3 at the U.S. Department of Energy (DOE) Fernald Environmental Management Project in Fernald, Ohio, which was chosen in accordance with the comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), and, to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

The proposed interim remedial action for Operable Unit 3 represents a major portion of the remedial action for the operable unit and for the site as a whole. While DOE maintains an active maintenance program, the former uranium processing support facilities contained within Operable Unit 3 are, in general, at or beyond their design life and in a state of advancing deterioration. These current conditions indicate an increasing probability of future releases of hazardous substances to the environment due to structural collapse or other failure mechanisms. While the DOE and EPA are proceeding toward a decision on the final disposition of these structures as part of the Operable Unit 3 RI/FS process, the decision resulting from this effort will not likely occur until late 1997.

The decision presented herein for the interim remedial action is based on information available in the administrative record for operable unit 3 maintained in accordance with CERCLA. This document was made available for public review and comment. This decision is also based on the issues raised at the public meeting held on January 5, 1994 and the comments received during the public comment period following the issuance of the Proposed Plan/Environmental Assessment. DOE and EPA have considered all comments received during the public comment period on the Proposed Plan/Environmental Assessment in making this decision.

The State of Ohio concurs with the selected remedy.

ASSESSMENT OF THE SITE:

Actual or threatened releases of hazardous substances from Operable Unit 3, if not addressed by implementing the response action selected in this Record of Decision for Interim Remedial Action, may present a current or potential threat to public health, welfare, or the environment.

DESCRIPTION OF THE SELECTED REMEDY:

This Interim Record of Decision addresses contamination of all Operable Unit 3 facilities and structures, including former uranium production process buildings and equipment, support structures, below-grade and above-grade utilities, and identified ponds and basins. The Fernald Environmental Management Project is divided into five operable units, of which Operable Unit 3 is one, under investigation pursuant to the Amended Consent Agreement (EPA 1991a) between DOE and EPA. In addition to these five operable units, a comprehensive site-wide operable unit would evaluate the protectiveness of all site-wide remedial response actions.

The interim action selected remedy consists of decontaminating and dismantling all Operable Unit 3 structures and related facilities. The bulk of the debris and remediation waste generated will be placed into temporary storage; decisions concerning treatment and final disposition of stored remediation wastes and debris will be addressed and documented in the final remedial action Record of Decision for Operable Unit 3 in 1997.